

REDACTED

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GTECH CORPORATION,

Plaintiff,

v.

SCIENTIFIC GAMES INTERNATIONAL, INC.,
SCIENTIFIC GAMES HOLDINGS
CORPORATION, SCIENTIFIC GAMES
FINANCE CORPORATION, and SCIENTIFIC
GAMES CORPORATION,

Defendants.

Civil Action No. 04-138-JJF

~~Confidential - Filed Under Seal~~

DECLARATION OF JOSEPH C. PERIN, JR., P.E.

I, Joseph C. Perin, declare and state as follows:

1. I am a licensed professional engineer in the state of Ohio since 1993. I currently work as a software engineer at the Harris Corporation Broadcast Communications Division in the Networking and Government Communications Group. The details of my background and experience, which includes Bachelor of Science degrees in Marketing and Electrical Engineering, graduate coursework in engineering, over 20 years of engineering work experience, almost ten years of which involved engineering work concerning lottery machines including instant ticket vending machines ("ITVMs"), and experience with the design and operation of various components and peripherals of vending equipment, including ITVMs, including character and graphic displays, bursting and dispensing equipment, bill acceptors, coin acceptors, motors, and

sensors, just to name a few, are provided on my *curriculum vitae* which is annexed as Exhibit A to my opening expert report, Exhibit A hereto.

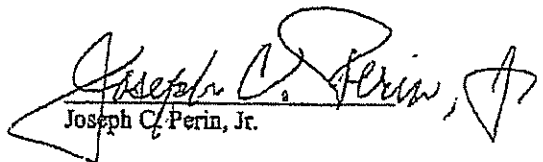
2. I have been engaged as an expert witness by plaintiff GTECH Corporation ("GTECH") in this litigation and submit this declaration on behalf of GTECH in support of its opposition to defendants', Scientific Games et al.'s, motion for summary judgment that its accused PlayCentral instant ticket vending machine does not infringe asserted claims 18 of U.S. Patent No. 5,222,624 (the "'624 patent") and claims 20 and 21 of U.S. Patent No. 4,982,337 (the "'337 patent") (collectively "the asserted claims").

3. I have previously provided expert reports on the issue of the infringement of the asserted claims of the '624 and '337 patents by defendants' PlayCentral machine. Those expert reports, dated August 12, 2005 and September 16, 2005, respectively, are attached hereto as Exhibits A and B.

4. I declare under penalty of perjury under the laws of the United States of America that the attached *Expert Report of Joseph C. Perin, Jr. P.E.*, dated August 12, 2005, is true and correct.

5. I declare under penalty of perjury under the laws of the United States of America that the attached *Rebuttal Expert Report of Joseph C. Perin, Jr. P.E.*, dated September 16, 2005, is true and correct.

Executed on December 1, 2005, at Cincinnati, Ohio.


Joseph C. Perin, Jr.

CERTIFICATE OF SERVICE

I, Andrew A. Lundgren, Esquire, hereby certify that on December 2, 2005, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

Jack B. Blumenfeld Esquire
Morris Nichols Arsht & Tunnell
1201 North Market Street
Wilmington, DE 19801

I further certify that on December 2, 2005, I caused a copy of the foregoing document to be served by hand delivery on the above-listed counsel of record.

YOUNG CONAWAY STARGATT & TAYLOR, LLP



Josy W. Ingersoll (#1088)
John W. Shaw (#3362)
Karen E. Keller (#4489)
Andrew A. Lundgren (#4429)
YOUNG CONAWAY STARGATT & TAYLOR, LLP
The Brandywine Building
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, Delaware 19899-0391
(302) 571-6600
kkeller@ycst.com

Attorneys for GTECH Corporation

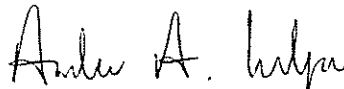
CERTIFICATE OF SERVICE

I, Andrew A. Lundgren, Esquire, hereby certify that on December 9, 2005, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

Jack B. Blumenfeld Esquire
Morris Nichols Arsht & Tunnell
1201 North Market Street
Wilmington, DE 19801

I further certify that on December 9, 2005, I caused a copy of the foregoing document to be served by hand delivery on the above-listed counsel of record.

YOUNG CONAWAY STARGATT & TAYLOR, LLP



Josy W. Ingersoll (#1088)
John W. Shaw (#3362)
Karen E. Keller (#4489)
Andrew A. Lundgren (#4429)
The Brandywine Building
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, Delaware 19899-0391
(302) 571-6600
alundgren@ycst.com

Attorneys for GTECH Corporation